

PADUANO & WEINTRAUB LLP
1251 AVENUE OF THE AMERICAS
NINTH FLOOR
NEW YORK, NEW YORK 10020

TELEPHONE: 212-785-9100
TELECOPIER: 212-785-9099

November 3, 2022

VIA ECF

Magistrate Judge Sarah L. Cave
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 18A
New York, New York 10007-1312

Re: Escobar v. Randa Accessories Leather Goods, LLC et al.;
Case No. 1:21-cv-09061-GHW-SLC

Your Honor:

We represent Defendant Randa Accessories Leather Goods, LLC in the above-referenced matter.

We write jointly with counsel for Plaintiff Amilcar Escobar to respectfully request that Your Honor so-order the attached Stipulation and Proposed Order Regarding Discovery with Respect to Defendant's Assertion of Privilege.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Noah H. Bunzl

Noah H. Bunzl

Cc: Stephen McQuade, Esq. (via ECF and electronic mail)

[Attachment]